

May 8, 2013

Carissa Cyran
Chemical Review Manager
Document Processing Desk (DCI/PRD)
Pesticide Re-evaluation Division (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
2777 South Crystal Drive
Arlington, VA 22202



Dear Ms. Cyran:

Re: **Mepiquat Chloride Generic Data Call-In Notice**
Willowood Mepiquat Chloride, LLC Response

In response to the subject Data Call-In Notice dated February 13, 2013 Wagner Regulatory Associates, Inc. is acting as Agent on behalf of Willowood Mepiquat Chloride, LLC to submit this response. I have enclosed an Agent letter authorizing Wagner Regulatory Associates, Inc. to submit this response. Willowood Mepiquat Chloride, LLC agrees to satisfy generic data requirements as indicated on the enclosed "Requirements Status and Registrant's Response". Willowood Mepiquat Chloride, LLC certifies that the Confidential Statement of Formula dated October 17, 2011 currently on file at EPA is the most current.

Enclosed are the following documents in support of this response:

- Agent letter appointing Wagner Regulatory Associates, Inc. to act as registrant agent
- EPA Application Form (8570-1)
- Data Call-In Response form
- Requirements Status and Registrant's Response Form
- Certification with Respect to Citation of Data form, EPA Form 8570-34
- Data Matrix, EPA Internal and Public copies
- Certification of Attempt to Enter Into an Agreement with Registrants for Development of Data, EPA Form 8570-32
- Copies of offers to share in the cost to develop data submitted to mepiquat chloride registrants identified in the DCI.

Should you require any additional information, please feel free to contact me via telephone at (302) 635-7289 or email at Cheryl@wagnerreg.com.

Respectfully submitted,

Cheryl Wagner
Agent for Willowood Mepiquat Chloride, LLC

Enc.



Willowood Mepiquat Chloride, LLC

August 24, 2011

To: Whom it May Concern

Re: Designation of Agent for:

Willowood Mepiquat Chloride, LLC
1600 NW Garden Valley Blvd.
Suite 120
Roseburg, OR 97471

Dear Sir or Madam:

This letter serves as notification that Willowood Mepiquat Chloride, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to its Mepiquat Chloride products that Willowood Mepiquat Chloride, LLC will register with US EPA and the states. Please forward all correspondence for Willowood Mepiquat Chloride, LLC and its products to:

Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me at if you have any questions.

Respectfully submitted,



Brian Heinze
President/CEO

cc: WRA, Inc.

1600 NW Garden Valley Blvd., Suite 120 | Roseburg, Oregon 97471



United States
Environmental Protection Agency
 Washington, DC 20460

Registration

OPP Identifier Number

Amendment

X

Other

Application for Pesticide - Section I

1. Company/Product Number

88781-1

2. EPA Product Manager

Tony Kish

3. Proposed Classification

4. Company/Product (Name)

Willowood Mepiquat Chloride, LLC/
 Willowood Mepiquat Chloride Technical

PM#

22

☒ None

Restricted

5. Name and Address of Applicant (Include Zip Code)

Willowood Mepiquat Chloride, LLC
 c/o Wagner Regulatory Associates, Inc.
 P.O. Box 640
 Hockessin, DE 19707

☐ Check if this is a new address6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:

EPA Reg. No.

Product Name:

Section - II☐ Amendment - Explain below.☐ Resubmission in response to Agency letter dated _____☐ Notification - Explain below.☐ Final printed labels in response to Agency letter dated _____☐ "Me Too" Application.☒ Other - Explain below.**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

Response to Data Call-In 109101-1212

Section - III1. **Material This Product Will Be Packaged In:**

Child-Resistant Packaging

☐ Yes*
☒ No

Unit Packaging

☐ Yes
☒ No

Water Soluble Packaging

☐ Yes
☒ No

2. Type of Container

☐ Metal
☒ Plastic
☐ Glass
☐ Paper
☐ Other (Specify) HDPE lined bags

*** Certification must be submitted**

If "Yes" No. per
 Unit Packaging wgt. container

If "Yes" No. per
 Package wgt. container

3. Location of Net Contents Information

☒ Label ☐ Container

4. Size(s) Retail Container

500 kg (1102 lbs)

5. Location of Label Directions

☐ On Label
☒ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☒ Paper glued
☐ Stenciled

☐ Other _____**Section - IV**1. **Contact Point** (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name

Cheryl Wagner

Title

Agent for Willowood Mepiquat Chloride, LLC

Telephone No. (include Area Code)

(302) 635-7289

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received

(Stamped)

2. Signature

3. Title

Agent for Willowood Mepiquat Chloride, LLC

4. Typed Name

Cheryl Wagner

May 8, 2013

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address WILLOWOOD MEPIQUAT CHLORIDE, LLC P.O. Box 640 HOCKESSIN, DE 19707		2. Case # and Name 2375 - Mepiquat chloride Chemical # and Name: 109101 Mepiquat chloride		3. Date and Type of DCI and Number 13-Feb-2013 GENERIC ID # GDCI-109101-1212	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
88781-1			X	N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.					9. Date May 8, 2013
Signature and Title of Company's Authorized Representative <u>Cheryl Wagner</u> Agent					
10. Name of Company Willowood Mepiquat Chloride LLC					11. Phone Number 302-635-7289

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address

WILLOWOOD MEPIQUAT CHLORIDE, LLC
P.O. Box 640
HOCKESSIN, DE 19707

2. Case # and Name

2375 - Mepiquat chloride
Chemical # and Name: 109101
Mepiquat chloride

3. Date and Type of DCI and Number

13-Feb-2013
GENERIC
ID # GDCI-109101-1212

4. Guideline Requirement Number

5. Study Title

P
R
O
T
O
C
O
L

Progress Reports

6. Use Pattern

7. Test Substance

8. Time Frame (Months)

9. Registrant Response

1 2 3

835.4300

Environmental Fate Data Requirements (Conventional Chemical)

Aerobic aquatic metabolism

N

R

TGAI

24

3

835.4400

Anaerobic aquatic metabolism

N

R

TGAI

24

3

835.6100

Terrestrial field dissipation

N

R

TGAI

24

3

Nontarget Plant Protection Data Requirements (Conventional Chemical)

850.4225

Seedling emergence, Tier II

N

R

TEP

12

3

850.4250

Vegetative vigor, Tier II

N

R

TEP

12

3

Toxicology Data Requirements (Conventional Chemical)

870.3465

90-day inhalation toxicity

N

R

TGAI

24

3

870.7800

Immunotoxicity

N

R

TGAI

0

3

10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative



Agent

11. Date

May 8, 2013

12. Name of Company Willowood Mepiquat Chloride, LLC

13. Phone Number 302-635-7289

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2375 - Mepiquat chloride

DCI Number: GDCI-109101-1212

Key: Residue of Concern = Residue of Concern; TEP = Typical End Use Product [TEP]; TGA = Technical Grade Active Ingredient [TGA]; TGA/PAIRA = Technical Grade of the Active Ingredient or Pure Active Ingredient, Radio Labelled; TGA, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGA/PAJ = Technical Grade Active Ingredient, Pure Active Ingredient

Use Categories Key:

R - Agricultural premises and equipment

Footnotes: The following footnotes are referenced in column two (5. Study Title) of the Requirements Status and Registrant's Response form. These footnotes apply in addition to any test notes included in 40 CFR Part 158 with respect to the particular data requirement.

- 1 Required if there is the likelihood of significant repeated inhalation exposure to the pesticide as a gas, vapor, or aerosol.
- 2 On June 27, 2012, EPA announced certain revisions in harmonized guideline series 850 Ecological Effects Tests including renumbering and/or removal of the Tier designation for some guideline studies. See Final Test Guidelines; OCSP 850 Series; Notice of Availability 77 FR 38282, June 27, 2012. <http://www.regulations.gov/#documentDetail;D=EPA-HQ-OPPT-2009-0154-0026>
- 3 Environmental chemistry methods used to generate data associated with this study must include results of a successful confirmatory method trial by an independent laboratory. The environmental chemistry methods must include a statement of no data confidentiality claims, i.e., non-CBL. Test standards and procedures for independent laboratory validation are available as addenda to the guideline for this test requirement.
- 4 Based on estimates of the magnitude and duration of human exposure, studies of shorter duration, e.g., 21 or 28-days, may be sufficient to satisfy this requirement. Registrants should consult with the Agency to determine whether studies of shorter duration would meet this requirement.
- 5 A Tier II study is required. The DCI expected to be issued will provide that a Tier I plant (terrestrial and aquatic) study may be conducted in lieu of a Tier II study with the understanding that any adverse effects observed by the Tier I study would necessitate conduct and submission of a Tier II study as well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 Willowood Mepiquat Chloride, LLC, P.O. Box 640, Hockessin, DE 19707

EPA Registration Number/File Symbol
 88781-1

Active Ingredient(s) and/or representative test compound(s)
 Mepiquat chloride

Date
 5/8/2013

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 Terrestrial Food and Terrestrial Non-food

Product Name
 Willowood Mepiquat Chloride Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Cheryl Wagner

Date

5/8/2013

Typed or Printed Name and Title

Cheryl Wagner, Agent



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: 5/8/2013	EPA Reg No./ File Symbol: 88781-1	Page 1 of 3
Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product identity & Composition/Description of Materials Used to Produce the Product/Description of Production & Formulation Process/Discussion of Formation of Impurities	48630801	Willowood Mepiquat Chloride, LLC	Own	
830.1700	Preliminary Analysis	48630802	Willowood Mepiquat Chloride, LLC	Own	
830.1750	Certification of Limits		Willowood Mepiquat Chloride, LLC	Own	1
830.1800	Enforcement Analytical Method	48630802	Willowood Mepiquat Chloride, LLC	Own	
830.6302	Color	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6303	Physical State	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6304	Odor	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6313	Stability to Normal & Elevated Temperatures	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6314	Oxidation/Reduction	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6315	Flammability	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6316	Explosibility	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6317	Accelerated Storage Stability	48976001	Willowood Mepiquat Chloride, LLC	Own	
830.6319	Miscibility	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6320	Corrosion Characteristics	48976001	Willowood Mepiquat Chloride, LLC	Own	
830.6321	Dielectric Breakdown Voltage	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7000	pH	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7050	UV/Visible Light Absorption	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7100	Viscosity	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7200	Melting Point	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7220	Boiling Point	48630803	Willowood Mepiquat Chloride, LLC	Own	

Signature

Name and Title

Cheryl Wagner,
Agent for Willowood Mepiquat Chloride, LLC

Date

5/8/2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: 5/8/2013	EPA Reg No./ File Symbol: 88781-1	Page 2 of 3
Applicant's/Registrant's Name and Address:	Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7300	Relative Density	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7370	Dissociation Constants in Water	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7550, 7560, 7570	Octanol/Water Partition Coefficient	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7840, 7860	Water Solubility	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7950	Vapor Pressure	48630803	Willowood Mepiquat Chloride, LLC	Own	
835.4300	Aerobic Aquatic Metabolism			Gap	
835.4400	Anaerobic Aquatic Metabolism			Gap	
835.6100	Terrestrial Field Dissipation			Gap	
850.4225	Seedling Emergence, Tier II			Gap	
850.4250	Vegetative Vigor, Tier II			Gap	
870.3465	90-Day Inhalation Toxicity			Gap	
870.7800	Immunotoxicity			Gap	
870.1100, 870.1200, 870.1300, 870.2400, 870.2500, 870.2600 Generic Data	Acute Oral Toxicity, Acute Dermal Toxicity, Acute Inhalation Toxicity, Primary Eye Irritation, Primary Dermal Irritation, Skin Sensitization Generic Data	Cite All	Bayer CropScience LP. RTP, NC Aceto Agricultural Chemicals Corp. Lake Success, NY BASF Corporation, RTP, NC Loveland Products, Inc., Greeley, CO Albaugh Inc., Ankeny, IA Nufarm USA, Inc, RTP, NC Arysta LifeScience North America, LLC, Cary, NC	Pay	

Signature

Name and Title

Cheryl Wagner,
Agent for Willowood Mepiquat Chloride, LLC

Date

5/8/2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 5/8/2013

EPA Reg No./ File Symbol: 88781-1

Page 3 of 3

Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC
c/o Wagner Regulatory Associates Inc.
P.O. Box 640
Hockessin, DE 19707

Product:
Willowood Mepiquat Chloride Technical

Ingredient: Mepiquat Chloride

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Spray Drift Task Force Washington, DC		
			Gowan Pacific Group, LLC Yuma, AZ		
			Outdoor Residential Exposure Task Force, Washington, DC		
			Agricultural Reentry Task Force Washington, DC		
			Integrated Farming, Inc., Raleigh, NC		
			FIFRA Endangered Species Task Force Washington, DC		
			The Hide Group, Inc., Sardis, MS		
			Agricultural Handlers Exposure Task Force, Macon, MO		
			Gro-Pro, LLC, Gig Harbor, WA		
			U.S.A. Ag Chemicals, Inc. Washington, DC		
			Tacoma Ag, LLC, Brookfield, CT		
			Agsaver, LLC, Washington, DC		
			Generic Endangered Species Task Force, Gig Harbor, WA		

Footnotes: 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4

Signature

Name and Title

Cheryl Wagner,
Agent for Willowood Mepiquat Chloride, LLC

Date

5/8/2013



United States Environmental Protection Agency
Washington, D.C. 20460

CERTIFICATION OF ATTEMPT TO ENTER INTO AN
AGREEMENT WITH REGISTRANTS FOR
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;
2070-0107; 2070-0122;
2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

Willowood Mepiquat Chloride, LLC

Company Number

88781

Chemical Name

Mepiquat Chloride

EPA Chemical Number

109101

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

Agsaver, LLC
Celsius Property B.V.
CP Bio, Inc.
Nufarm USA, Inc.
Tacoma Ag, LLC
Bayer Cropscience, LP

BASF Corporation
Arysta Lifescience North
America, LLC
Albaugh, Inc.
Drexel Chemical Co.

Date of Offer

May 8, 2013

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Cheryl Wagner

Date

May 8, 2013

Name and Title (Please Print or Type)

Cheryl Wagner, Agent for Willowood Mepiquat Chloride, LLC

Federal Express

May 8, 2013

Agsaver, LLC
c/o Sullivan & Worcester, LLP
1666 K Street
Washington, DC 20006



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

In the referenced EPA Generic Data Call-In Notice (DCI) of February 13, 2013 for mepiquat chloride, your company is included in the list of registrants receiving the DCI. In connection with this DCI, Willowood Mepiquat Chloride, LLC is interested in sharing in the cost to develop data as listed below as required by the DCI. Therefore, Willowood Mepiquat Chloride, LLC hereby offers to jointly develop or share in the cost of developing the studies listed below to the extent required by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) § 3(c)(2)(B).

This offer includes the following studies listed in the GDCI for mepiquat chloride:

- 835.4300 Aerobic Aquatic Metabolism
- 835.4400 Anaerobic Aquatic Metabolism
- 835.6100 Terrestrial Field Dissipation
- 850.4225 Seedling Emergence, Tier II
- 850.4250 Vegetative Vigor, Tier II
- 870.3465 90-Day Inhalation Toxicity
- 870.7800 Immunotoxicity

In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to: c/o Sullivan & Worcester, LLP Agsaver, LLC 1666 K Street Washington, DC 20006 US 202-775-1235	Ship from: James Wagner Wagner Regulatory Associates, Inc. 7219 Lancaster Pike, Suite #A P.O. Box 640 Hockessin, DE 19707 US 3026357290
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Shipment Information:

Tracking no.: 799710273484
Ship date: 05/08/2013
Estimated shipping charges: 12.12

Package Information

Service type: FedEx Express Saver
Package type: FedEx Envelope
Number of packages: 1
Total weight: 1 LBS
Declared Value: 0.00 USD
Special Services:
Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361
Your reference: WW Mepiquat Chloride DCI
P.O. no.:
Invoice no.:
Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits. Consult the applicable FedEx Service Guide for details. The estimated shipping charge may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable [FedEx Service Guide](#) or the [FedEx Rate Sheets](#) for details on how shipping charges are calculated.

Federal Express

May 8, 2013

Celsius Property B.V.
Amsterdam (NL)
c/o MANA, Inc.
3120 Highwoods Blvd.
Suite 100
Raleigh, NC 27604



WRA

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

In the referenced EPA Generic Data Call-In Notice (DCI) of February 13, 2013 for mepiquat chloride, your company is included in the list of registrants receiving the DCI. In connection with this DCI, Willowood Mepiquat Chloride, LLC is interested in sharing in the cost to develop data as listed below as required by the DCI. Therefore, Willowood Mepiquat Chloride, LLC hereby offers to jointly develop or share in the cost of developing the studies listed below to the extent required by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) § 3(c)(2)(B).

This offer includes the following studies listed in the GDCI for mepiquat chloride:

- 835.4300 Aerobic Aquatic Metabolism
- 835.4400 Anaerobic Aquatic Metabolism
- 835.6100 Terrestrial Field Dissipation
- 850.4225 Seedling Emergence, Tier II
- 850.4250 Vegetative Vigor, Tier II
- 870.3465 90-Day Inhalation Toxicity
- 870.7800 Immunotoxicity

In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC

Federal Express

May 8, 2013

CP Bio, Inc.
4802 Murrieta Street
Chino, CA 91710



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

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- 870.7800 Immunotoxicity

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Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

Select or enter
CP Bio, Inc.

4802 Murrieta Street

Chino, CA

91710

US

(909) 348-5133

Ship from:

James Wagner

Wagner Regulatory

Associates, Inc.

7219 Lancaster Pike, Suite

#A

P.O. Box 640

Hockessin, DE

19707

US

3026357290

Shipment Information:

Tracking no.: 799710504644

Ship date: 05/08/2013

Estimated shipping charges: 16.34

Package Information

Service type: FedEx Express Saver

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361

Your reference: WW Mepiquat Chloride DCI

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits. Consult the applicable FedEx Service Guide for details. The estimated shipping charge may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable [FedEx Service Guide](#) or the FedEx Rate Sheets for details on how shipping charges are calculated.

Federal Express

May 8, 2013

Nufarm USA, Inc.
c/o DuPont Crop Protection
4020 Aerial Center Pkwy.
Suite 101
Morrisville, NC 27560-8563



**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

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- 850.4250 Vegetative Vigor, Tier II
- 870.3465 90-Day Inhalation Toxicity
- 870.7800 Immunotoxicity

In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read 'James M. Wagner', is written above the typed name.

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

c/o DuPont Crop Protection
NuFarm USA, Inc.

4020 Aerial Center Pkwy.

Suite 101

MORRISVILLE, NC

27560-8563

US

(919) 379-2502

Ship from:

James Wagner
Wagner Regulatory

Associates, Inc.

7219 Lancaster Pike, Suite

#A

P.O. Box 640

Hockessin, DE

19707

US

3026357290

Shipment Information:

Tracking no.: 799710598589

Ship date: 05/08/2013

Estimated shipping charges: 12.18

Package Information

Service type: FedEx Express Saver

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361

Your reference: WW Mepiquat Chloride DCI

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

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Federal Express

May 8, 2013

Tacoma Ag, LLC
c/o Biologic, Inc.
115 Obtuse Hill Road
Brookfield, CT 06804



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

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- 850.4225 Seedling Emergence, Tier II
- 850.4250 Vegetative Vigor, Tier II
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- 870.7800 Immunotoxicity

In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

c/o Biologic, Inc.
Tacoma Ag, LLC

115 Obtuse Hill Road

Brookfield, CT

06804

US

203-740-1200

Ship from:

James Wagner
Wagner Regulatory

Associates, Inc.

7219 Lancaster Pike, Suite

#A

P.O. Box 640

Hockessin, DE

19707

US

3026357290

Shipment Information:

Tracking no.: 799710727765

Ship date: 05/08/2013

Estimated shipping charges: 12.12

Package Information

Service type: FedEx Express Saver

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361

Your reference: WW Mepiquat Chloride DCI

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

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Federal Express

May 8, 2013

BASF Corp.
26 Davis Drive
Research Triangle Park, NC 27709-3528



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

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- 850.4225 Seedling Emergence, Tier II
- 850.4250 Vegetative Vigor, Tier II
- 870.3465 90-Day Inhalation Toxicity
- 870.7800 Immunotoxicity

In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

Select or enter
BASF Corp.

26 Davis Drive

RESEARCH TRIANGLE

PARK, NC

27709-3528

US

919 547-2000

Ship from:

James Wagner

Wagner Regulatory

Associates, Inc.

7219 Lancaster Pike, Suite

#A

P.O. Box 640

Hockessin, DE

19707

US

3026357290

Shipment Information:

Tracking no.: 799710787977

Ship date: 05/08/2013

Estimated shipping charges: 12.18

Package Information

Service type: FedEx Express Saver

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361

Your reference: WW Mepiquat Chloride DCI

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

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Federal Express

May 8, 2013

Bayer Cropscience, LP
2 T. W. Alexander Dr.
Research Triangle Park, NC 27709



**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

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- 870.3465 90-Day Inhalation Toxicity
- 870.7800 Immunotoxicity

In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "James M. Wagner". The signature is fluid and cursive, with a long horizontal stroke at the end.

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

Select or enter
Bayer Cropscience, LP

2 T.W. Alexander Drive

RESEARCH TRIANGLE
PARK, NC

27709

US

(919) 549-2000

Ship from:

James Wagner
Wagner Regulatory

Associates, Inc.

7219 Lancaster Pike, Suite

#A

P.O. Box 640

Hockessin, DE

19707

US

3026357290

Shipment Information:

Tracking no.: 799710848825

Ship date: 05/08/2013

Estimated shipping charges: 12.18

Package Information

Service type: FedEx Express Saver

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361

Your reference: WW Mepiquat Chloride DCI

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

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WRA

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Federal Express

May 8, 2013

Arysta Lifescience North America, LLC
15401 Weston Parkway
Suite 150
Cary, NC 27513

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

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Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

Select or enter
Arysta Lifescience North
America, L
15401 Weston Parkway

Suite 150
CARY, NC
27513
US
919-678-4900

Ship from:

James Wagner
Wagner Regulatory
Associates, Inc.
7219 Lancaster Pike, Suite

#A
P.O. Box 640
Hockessin, DE
19707
US
3026357290

Shipment Information:

Tracking no.: 799710904510
Ship date: 05/08/2013
Estimated shipping charges: 12.18

Package Information

Service type: FedEx Express Saver
Package type: FedEx Envelope
Number of packages: 1
Total weight: 1 LBS
Declared Value: 0.00 USD
Special Services:
Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361
Your reference: WW Mepiquat Chloride DCI
P.O. no.:
Invoice no.:
Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

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Federal Express

May 8, 2013

Albaugh, Inc.
2935 N. Ashley Street
Valdosta, GA 31064



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

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In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

Select or enter
Albaugh, Inc.

2935 N. Ashley Street

Valdosta, GA

31064

US

(229) 244-3288

Ship from:

James Wagner
Wagner Regulatory
Associates, Inc.

7219 Lancaster Pike, Suite

#A

P.O. Box 640

Hockessin, DE

19707

US

3026357290

Shipment Information:

Tracking no.: 799710941683

Ship date: 05/08/2013

Estimated shipping charges: 14.69

Package Information

Service type: FedEx Express Saver

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361

Your reference: WW Mepiquat Chloride DCI

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

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Federal Express

May 8, 2013

Drexel Chemical Co.
1700 Channel Ave.
Memphis, TN 38113



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

**Subject: Offer to Share in the Cost of Developing Data in Response to EPA Data Call-In Notice
GDCI-109101-1212 for Mepiquat Chloride**

Dear Sir or Madam:

In the referenced EPA Generic Data Call-In Notice (DCI) of February 13, 2013 for mepiquat chloride, your company is included in the list of registrants receiving the DCI. In connection with this DCI, Willowood Mepiquat Chloride, LLC is interested in sharing in the cost to develop data as listed below as required by the DCI. Therefore, Willowood Mepiquat Chloride, LLC hereby offers to jointly develop or share in the cost of developing the studies listed below to the extent required by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) § 3(c)(2)(B).

This offer includes the following studies listed in the GDCI for mepiquat chloride:

- 835.4300 Aerobic Aquatic Metabolism
- 835.4400 Anaerobic Aquatic Metabolism
- 835.6100 Terrestrial Field Dissipation
- 850.4225 Seedling Emergence, Tier II
- 850.4250 Vegetative Vigor, Tier II
- 870.3465 90-Day Inhalation Toxicity
- 870.7800 Immunotoxicity

In your return correspondence, please indicate if your company is willing to jointly develop or share in the cost of developing the above data with Willowood Mepiquat, LLC. Thank you for your consideration.

Sincerely,

James M. Wagner
Agent for Willowood Mepiquat Chloride, LLC



Shipment Receipt

Address Information

Ship to:

Select or enter
Drexel Chemical Co.

1700 Channel Avenue

MEMPHIS, TN

38113

US

(901) 774-4370

Ship from:

James Wagner
Wagner Regulatory

Associates, Inc.

7219 Lancaster Pike, Suite

#A

P.O. Box 640

Hockessin, DE

19707

US

3026357290

Shipment Information:

Tracking no.: 799710976909

Ship date: 05/08/2013

Estimated shipping charges: 12.32

Package Information

Service type: FedEx Express Saver

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: Use an already scheduled pickup at my location

Billing Information:

Bill transportation to: WRA-361

Your reference: WW Mepiquat Chloride DCI

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits. Consult the applicable FedEx Service Guide for details. The estimated shipping charge may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable FedEx Service Guide or the FedEx Rate Sheets for details on how shipping charges are calculated.